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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD.)	
)	
Plaintiff,)	
)	Case No.: 3:19-cv-1671
v.)	
)	IN ADMIRALTY
Amis Integrity S.A. <i>in personam</i> and)	
M/V AMIS INTEGRITY (IMO 9732412))	
her engines, freights, apparel,)	
appurtenances, tackle, etc., <i>in rem</i> ,)	
)	
Defendant.)	

PLAINTIFF DRY BULK SINGAPORE PTE. LTD.'S EX PARTE
MOTION TO ALLOW CARGO HANDLING, REPAIRS, AND MOVEMENT
OF THE VESSEL

COME NOW Plaintiff DRY BULK SINGAPORE PTE. LTD. (hereinafter "DRY BULK" or "Plaintiff"), by and through its attorney, pursuant to Supplemental Rule C(3) of the federal Supplemental Rules for Certain Admiralty and Maritime Claims, hereby moves the Court for an order permitting the M/V AMIS INTEGRITY (the "Vessel"), while under arrest and/or

attachment, to conduct normal operations, including fueling, loading, discharging and other cargo handling at the port and, if necessary, safe movement within the waters of the Columbia River in this District.

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This motion is made under Local Admiralty Rule 1035-2. The grounds for this motion are that permitting normal operations will minimize the disruption to the Vessel and the Marine Terminal arising from the arrest while maintaining the Court's jurisdiction over the Vessel *in rem*. A form of proposed Order is submitted with this Motion.

Dated: October 17, 2019

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

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